

# PRITCHARD

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN COOK,  
CHARLES ELIZONDO,  
CARLOS VALERIO,  
TIMOTHY DAVIS,  
HAROLD COOK,  
VINCENT BERRY,  
ETHEL FOSTER,  
LARRY FOSTER,  
JESSIE COOK,  
RICHARD DELAROSA,  
MARIA DE LA FUENTE,  
UNDRA WATSON,  
MARCOS CHAIREZ,  
JOE LEE GONZALEZ,  
TERRANCE BROOKS, and  
LUIS DELAROSA,

Defendants.

CR. NO. 11-20006-SHM

21 U.S.C. § 846

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Beginning at a time unknown to the grand jury, but at least from in or about November of 2009 and continuing until in or about December of 2010, in the Western District of Tennessee, the defendants,

-----STEPHEN COOK,-----  
-----CHARLES ELIZONDO,-----  
-----CARLOS VALERIO-----  
-----TIMOTHY DAVIS,-----  
-----HAROLD COOK,-----  
-----VINCENT BERRY,-----  
-----ETHEL FOSTER,-----  
-----LARRY FOSTER,-----  
-----JESSIE COOK,-----  
-----RICHARD DELAROSA,-----

-----**MARIA DE LA FUENTE,**-----  
-----**UNDRA WATSON,**-----  
-----**MARCOS CHAIREZ,**-----  
-----**JOE LEE GONZALEZ,**-----  
-----**TERRANCE BROOKS,**-----  
-----**and**-----  
-----**LUIS DELAROSA**-----

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, to possess with the intent to distribute at least one thousand kilograms of a mixture and substance containing a detectable amount of marijuana, a controlled substance as classified by Title 21, United States Code, Section 812, as a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.

[nlt 10 yrs, nmt life, plus \$4,000,000 fine, plus 5 yrs. supervised release (or, after a prior drug felony conviction, nlt 20 yrs, nmt life, plus \$8,000,000 fine, plus 10 yrs. supervised release), together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**COUNT TWO**

Beginning at a time unknown to the grand jury, but at least from in or about November of 2009 and continuing until in or about December of 2010, in the Western District of Tennessee, the defendants,

-----STEPHEN COOK,-----  
-----CHARLES ELIZONDO,-----  
-----CARLOS VALERIO-----  
-----TIMOTHY DAVIS,-----  
-----HAROLD COOK,-----  
-----VINCENT BERRY,-----  
-----ETHEL FOSTER,-----  
-----LARRY FOSTER,-----  
-----JESSIE COOK,-----  
-----RICHARD DELAROSA,-----  
-----MARIA DE LA FUENTE,-----  
-----UNDRA WATSON,-----  
-----MARCOS CHAIREZ,-----  
-----JOE LEE GONZALEZ,-----  
-----TERRANCE BROOKS,-----  
-----and-----  
-----LUIS DELAROSA-----

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance as classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, in violation of Title 21, United States Code, Section 846.

[nlt 10 yrs., nmt life, plus \$4,000,000 fine, plus 5 yrs. supervised release (or, after a prior drug felony conviction, nlt 20 yrs., nmt life, plus \$8,000,000 fine, plus 10 yrs. supervised release), together with a mandatory special assessment of \$100, see 18 U.S.C. Section 3013(a).]

**A TRUE BILL:**

\_\_\_\_\_  
**FOR PERSON**

**DATED:** \_\_\_\_\_

\_\_\_\_\_  
**EDWARD L. STANTON, III**  
**UNITED STATES ATTORNEY**